

UNITED STATES OF AMERICA

v.

NO. 3:18-cr-00623-S-1

RICHARD HALL (01)

MOTION FOR DETENTION

The United States moves for pretrial detention of defendant, Richard Hall, pursuant to 18 U.S.C. § 3142(e) and (f). The United States made an oral motion for detention on December 18, 2018 and now files this written motion.

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. §3156);
- ☐ Maximum sentence life imprisonment or death
- ☐ 10 + year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice
- ☐ Felony involving a minor victim
- ☐ Felony involving a firearm, destructive device, or any other dangerous weapon
- ☐ Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

 X Defendant's appearance as required

 Safety of any other person and the community

3. Rebuttable Presumption. The United States will/**will not** invoke the rebuttable presumption against defendant because (check one or both):

 Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. §924(c)

 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. §2332b(g)(5)

 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§1201, 2251

 Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

 At first appearance

 X After continuance of 1 day (not more than 3).

DATED this 19th day of December , 2018.

Respectfully submitted,

TANYA PIERCE
ATTORNEY FOR THE UNITED STATES,
ACTING UNDER AUTHORITY
CONFERRED BY 28 U.S.C. § 515

s/ Adrienne E. Frazier
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on counsel for the
defendant in accordance with the Federal Rules of Criminal Procedure on this 19th
day of December, 2018.

s/ Adrienne E. Frazier
Adrienne E. Frazier